IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	David Yu Chang, William Mitchell Edwards, Russell Ley Newcombe		
Assignee:	International Business Machines Corporation		
Title:	Method and System for Implementing an Application-Based Naming System		
Serial No.:	10/621,902	Filing Date:	July 17, 2003
Examiner:	Phuong Thao Cao	Group Art Unit:	2164
Docket No.:	AUS920030082US1	Customer No.:	65362

Austin, Texas
September 18, 2007

COMMISSIONER FOR PATENTS
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PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1, 3 - 9, 11-17 and 19-24 are pending in the application. Claims 1, 3 - 9, 11-17 and 19-24 have been rejected. Claims 1, 3-9, 11-17 and 19-24 stand rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,813,690 to Lango et al. ("Lango").

REMARKS

The present invention relates to naming services which support an instance of a naming system. The application sets forth that

[a] "naming system" is a connected set of context of the same type, i.e., having the same naming convention, and providing the same set of operations with identical semantics. A "naming service" is a service that is offered to support an instance of a naming system; e.g., a naming service may be a set of APIs that provide the operations that are required to implement the syntactic rules for generating and manipulating names within the naming system. (Chang Application ¶ 0033.)

Additionally, when discussing the application based naming system of the present invention, the application sets forth:

an application-based name is a compound name that comprises an application name and at least one deployment name. An application name is an atomic name that is associated with one or more instances of an application. A deployment name is an atomic name that is associated with a deployment attribute. A deployment attribute may include any metadata that characterizes the manner in which a particular instance of an application is deployed within a distributed data processing system. For example, a deployment attributed may characterize a series of versions of an application, each version being similar to each other yet differing in certain elements or features of a period of time. A deployment attribute may include: deployment identifier (ID),which may be a unique identifier associated with the deployment operation, wherein the identifier may be unique, for example, over all deployment operations, within the distributed data processing system or over all deployment operations for versions or instance of a particular application; a version number/identifier or an edition number/identifier associated with a version of the application, e.g., a version number that increases over time to identify each iteration of improvements in a series of modifications to an application; or some other identifier for a deployment-associated characteristic or metric, such as a date on which the deployment was performed. (Chang Application ¶ 0056.)

Lango relates to techniques for caching media data, including streaming media data, using content-sensitive identifiers. Lango sets forth that

there is a need for techniques that enable a caching proxy or a caching server to unambiguously determine the version of media data cached by the caching proxy for a particular data point or data reference (e.g., a URL) such that an appropriate version of the media data is served to a requesting client system in an efficient and economical manner. (Lango, Col. 2, lines 57 – 64.)

The technique set forth by Lango includes content-sensitive identifiers that enable a caching proxy or a caching server to unambiguously determine the version or contents of media data cached by the caching proxy for a particular data pointer or data reference (e.g., a URL) such that an appropriate version of the media data can be served to a requesting client system.

It is respectfully submitted that Lango does not disclose or suggest processing names by a naming service, much less certain elements prescribed by the method, system and apparatus for processing names by a naming service. Additionally, it is respectfully submitted that the media data disclosed by Lango is not equivalent to an application as disclosed and claimed in the present invention. An application includes code which executes where media data is data that must be executed by something. Additionally, it is respectfully submitted that the information related to various attributes and properties of the medium is not equivalent to a deployment name much less to a deployment name that is associated with a deployment attribute that characterizes a deployment of an instance of an application, as required by independent claims 1, 9 and 17.

More specifically, Lango does not teach or suggest a method for processing names by a naming service within a data processing system, where the method includes obtaining an application name that is associated with an application; obtaining a deployment name that is associated with a deployment attribute that characterizes a deployment of an instance of the application; and generating an application-based name for the instance of the application, much less such a method where *the application-based name is a compound name that comprises the application name and the deployment name* and where *a deployment attribute is a metadata value that characterizes a manner in which the instance of the application is deployed within the data processing system*, all as required by claim 1 and as substantially required by claims 9 and 17. Accordingly, claims 1, 9 and 17 are allowable over Lango. Claims 2 - 8 depend from claim 1 and are allowable for at least this reason. Claims 10 - 16 depend from claim 9 and are allowable for at least this reason. Claims 18 - 24 depend from claim 17 and are allowable for at least this reason.

When responding the Applicant's arguments, the Examiner set forth:

> Regarding Applicant's argument that Lango et al. does not teach or suggest a method, an apparatus and computer program product for processing names by a

naming service within a data processing system, <u>Lango et al.</u> teaches the caching server as a data processing system [column 3, lines 10-20] which generates object identifiers (names) [Fig.4] based on application name (i.e., URL), deployment name (i.e., Validator) and uses these generated names to identify and locate objects stored in the caching system. (Final office action dated June 18, 2007, Page 10.)

However, it is Applicant's position that Lango does not disclose or suggest processing names within a naming system as disclosed and claimed. As defined by the present application, a "naming system" is a connected set of context having the same naming convention and providing the same set of operations with identical semantics and a "naming service" is a service that is offered to support an instance of a naming system. The media data within Lango does not correspond to this definition of naming system or naming service.

Additionally, when responding the Applicant's arguments, the Examiner set forth:

Regarding <u>Applicant</u>'s argument that the media data disclosed by <u>Lango et al.</u> is not equivalent to an application as disclosed and claimed by the present invention, <u>Lango et al.</u> teaches in (column 1, lines 65-67 to column 2, lines 1-3) that media data may include executable files which are also called applications. (Final office action dated June 18, 2007, Page 10.)

However, it is Applicant's position that Lango does not disclose or suggest an application in the context of a naming system and thus the media data disclosed by Lango could not be equivalent to an application as disclosed and claimed. Additionally, when responding the Applicant's arguments, the Examiner set forth:

Regarding <u>Applicant</u>'s argument that the information related to various attributes and properties of the media data is not equivalent to the deployment name, <u>Lango et al.</u> discloses information related to various attributes and properties of the media data as media data description information [column 9, lines 36-40] which includes information which uniquely identifies the version or contents of media data [column 13, lines 1-3] associated with a URL wherein media data associated with a URL is an application [column 2, line 1], each version of the application represents a deployment of the application and information which uniquely identifies the version can be reasonably considered as identification of the deployment (or deployment name). In addition, the validator string (see [column 12, lines 58-67]-[column 13, lines1-10]) can also be interpreted as deployment name. (Final office action dated June 18, 2007, Page 10.)

However, it is Applicant's position that Lango does not disclose or suggest the information related to various attributes and properties of the medium is not equivalent to a deployment name much less to a deployment name that is associated with a deployment attribute that characterizes a deployment of an instance of an application and thus the information related to various attributes and properties of the media data disclosed by Lango could not be equivalent to a deployment name associated with a deployment attribute that characterizes a deployment of an instance of an application in the context of a naming system as disclosed and claimed.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned at 512-338-9100.

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I hereby certify that this correspondence is being electronically submitted to the COMMISSIONER FOR PATENTS via EFS on September 18, 2007.

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Respectfully submitted,

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